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July 8, 2003

***By Fax and FedEx***

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Two North Charles Street  
Baltimore, MD 21201

***Re: SimPort Litigation***

Dear Counsel:

In response to both KI's and GSE's first requests for the production of documents, enclosed please find three Confidential CDs bates numbered WSC 3169-3171. The CDs contain the portions of SimPort 1997 still in Western's custody and control, the first version of SimPort 2000 from the SeaBrook project, and the most recent version of SimPort 2000.

We have been trying to set up a conference call between all counsel in order to coordinate deposition dates, and to discuss the Motion to Compel with John pursuant to Local Rule 104(7), but with no success so far. Particularly given the need to also coordinate with the third-parties recently subpoenaed by Kurchatov, it is imperative that we find days when all counsel are available as soon as possible.

We are available to discuss dates any time this week, and suggest that you each e-mail your schedules so that we can find a mutually agreeable time to discuss these matters. To expedite that discussion, we provide the following calendar information, and urge you to do the same prior to the conference call:

WILLIAMS & CONNOLLY LLP  
John M.G. Murphy, Esq.  
Charles L. Simmons, Jr., Esq.  
July 8, 2003  
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Available Dates	Unavailable Dates
July 30, 31; Aug. 1 (short day); Week of Aug. 11; Week of Aug. 18; Most of Sept.	Week of July 22; July 29; Week of Aug. 4; Week of Aug. 25 Sept. 1-3 Sept. 11-12

We look forward to hearing from each of you soon.

Sincerely,

  
Margaret A. Keeley

Enclosure